

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 1:22-cv-21004-MD

JESSICA GUASTO,

Plaintiff,

vs.

THE CITY OF MIAMI BEACH, FL,
a Florida municipality,

Defendant.

/

**DEFENDANT'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE ITS REPLY TO
PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO TAX COSTS**

Defendant, THE CITY OF MIAMI BEACH, FL, (the “City”), through its counsel, files its Unopposed Motion for Extension of Time to File its Reply to Plaintiff’s Response to Defendant’s Motion to Tax Costs and in support states the following:

1. On February 21, 2025, this Court entered its Order on Defendant’s Motion for Summary Judgment [DE 108] granting summary judgment in favor of the City.
2. On April 7, 2025, the City filed its Motion to Tax Costs (“Motion”) [DE 115].
3. On April 18, 2025, Plaintiff filed her Response in Opposition to the City’s Motion [DE 118].
4. Accordingly, the City’s Reply to Plaintiff’s Response is due on or before April 25, 2025.
5. The City respectfully requests a very brief extension of time of seven (7) days to file its Reply to Plaintiff’s Response making the City’s Reply due on or before May 2, 2025.

6. Good cause exists for granting this extension.
7. Specifically, the City's lead counsel Michael Elkins has had, and continues to have, an extensive number of court deadlines during the current seven (7) day response period.
8. Thus, he is unable to adequately address Plaintiff's arguments during the current seven (7) day response period.
9. Undersigned counsel Michael Elkins certifies that he conferred with Plaintiff's counsel and there is no objection to the relief sought herein.
10. The City certifies that this Motion is made in good faith and not for purposes of delay.
11. Granting this Motion will not impact any other deadlines.

WHEREFORE, the City respectfully requests that the Court grant this Motion and set the deadline for the City to file its Reply to Plaintiff's Response as on or before May 2, 2025.

Dated: April 23, 2025.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 23, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/Michael L. Elkins
Michael L. Elkins

SERVICE LIST

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